

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA**

Adam Barron,

Plaintiff,

vs.

Case No. 1:17-cv-00245

BNSF Railway Company,

Defendant.

SPECIAL VERDICT FORM

[¶ 1] We, the Jury, make the following findings:

1. Was BNSF Railway Company's negligence a cause, in whole or in part, of Adam Barron's injuries reported on November 12, 2014?

X Yes _____ No

Complete the following Questions only if you answer "Yes" to Question 1. If you answer "No" to Question 1, please sign and date this Special Verdict Form and return to the Court.

2. We, the Jury, assess total damages of Plaintiff Adam Barron at

Past Medical Expenses \$ 100,000.00.

Past Earnings and Benefits \$ 621,461.00.

Future Medical Expenses \$ 100,000.00.

Future Earning Capacity and Benefits \$ 2,466,682.00.

Non-Economic Damages \$ 1,650,000.00.

3. Do you find Adam Barron failed to mitigate his damages?

X Yes _____ No

If your answer to Question 3 is "yes," then answer Question 4.

4. What percentage of Adam Barron's damages in Question 2 do you find could have been avoided by Adam Barron had he taken reasonable steps to mitigate his damages?

10 %

[¶ 2] DATED December 17, 2021.

Jury Leader